

**Exhibit E**

**Estimated Staffing and Budget Plan**

**STAFFING PLAN FOR SULLIVAN & CROMWELL LLP, COUNSEL TO THE  
DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD FEBRUARY 1, 2024 THROUGH APRIL 30, 2024**

<b>TIMEKEEPER CATEGORY</b>	<b>NUMBER OF TIMEKEEPERS EXPECTED TO WORK ON THE MATTER DURING THE APPLICATION PERIOD <sup>(1)</sup></b>	<b>RANGE OF RATES</b>
Partners	25	\$1,695.00-\$2,375.00
Special Counsel, Of Counsel, Associates	75	\$850.00-\$2,275.00
Non-Legal Personnel <sup>(2)</sup>	40	\$195.00-\$650.00

(1) Estimate is for total number of timekeepers billing any substantial number of hours to matter (not F.T.E.s).

(2) Includes clerks, legal analysts and eDiscovery professionals.

**ESTIMATED BUDGET FOR SULLIVAN & CROMWELL, COUNSEL  
TO THE DEBTORS AND DEBTORS-IN-POSSESSION,  
FOR THE PERIOD FEBRUARY 1, 2024 THROUGH APRIL 30, 2024**

<b>PROJECT CATEGORY</b>	<b>ESTIMATED HOURS<sup>1</sup></b>	<b>ESTIMATED FEES<sup>2</sup></b>	<b>HOURS BILLED</b>	<b>FEES SOUGHT</b>
ASSET ANALYSIS AND RECOVERY	1500.00	\$1,897,500.00	920.90	\$1,433,797.00
ASSET DISPOSITION	15000.00	\$18,975,000.00	2,950.80	\$3,759,938.00
ASSUMPTION AND REJECTION OF LEASES AND CONTRACTS	150.00	\$189,750.00	1.50	\$2,512.00
AVOIDANCE ACTION ANALYSIS	4000.00	\$5,060,000.00	1,603.20	\$2,266,175.00
BUSINESS OPERATIONS	900.00	\$1,138,500.00	242.80	\$386,879.00
CASE ADMINISTRATION	600.00	\$759,000.00	138.60	\$323,518.00
CLAIMS ADMINISTRATION AND OBJECTIONS	1100.00	\$1,391,500.00	411.20	\$548,198.50
CORPORATE GOVERNANCE AND BOARD MATTERS	400.00	\$506,000.00	96.10	\$198,774.00
EMPLOYEE BENEFITS AND PENSIONS	325.00	\$411,125.00	50.90	\$76,832.00
EMPLOYMENT AND FEE APPLICATIONS (S&C)	450.00	\$569,250.00	206.80	\$254,509.00

<sup>1</sup> Estimated hours represent high-end of S&C's estimates of hours during the interim fee period.

<sup>2</sup> Estimated fees represent high-end of S&C's estimates of fees during the interim fee period.

PROJECT CATEGORY	ESTIMATED HOURS <sup>1</sup>	ESTIMATED FEES <sup>2</sup>	HOURS BILLED	FEES SOUGHT
EMPLOYMENT AND FEE APPLICATIONS (OTHERS)	225.00	\$284,625.00	100.80	\$141,911.00
FINANCING AND CASH COLLATERAL	60.00	\$75,900.00	-	\$0.00
OTHER LITIGATION	2850.00	\$3,605,250.00	1,846.00	\$2,802,538.50
MEETINGS AND COMMUNICATIONS WITH CREDITORS	600.00	\$759,000.00	50.60	\$105,732.00
NON-WORKING TRAVEL	250.00	\$316,250.00	107.40	\$107,919.90
PLAN AND DISCLOSURE STATEMENT	4400.00	\$5,566,000.00	2,155.80	\$3,513,093.00
RELIEF FROM STAY AND ADEQUATE PROTECTION	120.00	\$151,800.00	19.50	\$25,225.00
TAX	2250.00	\$2,846,250.00	1,451.60	\$2,756,011.00
VALUATION	0.00	\$0.00	-	\$0.00
DISCOVERY	6000.00	\$7,590,000.00	3,469.60	\$3,465,754.00
HEARINGS	300.00	\$379,500.00	65.60	\$119,058.00
FIRST AND SECOND DAY MOTIONS	0.00	\$0.00	-	\$0.00
CLAIMS INVESTIGATION	300.00	\$379,500.00	22.80	\$20,294.50
GENERAL INVESTIGATION	2000.00	\$2,530,000.00	1,399.30	\$2,076,187.00
SCHEDULES, SOFAS AND REPORTING	45.00	\$56,925.00	11.10	\$23,976.00
OTHER MOTIONS/APPLICATIONS	1200.00	\$1,518,000.00	120.30	\$186,627.50
TIME ENTRY REVIEW	1800.00	\$2,277,000.00	748.40	\$0.00
BUDGETING	30.00	\$37,950.00	1.30	\$585.00
GENERAL REGULATORY	300.00	\$379,500.00	82.20	\$148,162.50
BAHAMAS MATTERS	300.00	\$379,500.00	22.90	\$28,874.00
FOREIGN DEBTOR MATTERS	2250.00	\$2,846,250.00	984.00	\$1,567,259.50
COORDINATION WITH FOREIGN PROCEDURES	450.00	\$569,250.00	2.20	\$5,225.00
COORDINATION IN OTHER BANKRUPTCIES	600.00	\$759,000.00	54.60	\$69,431.00
INVESTIGATIVE REPORTS	150.00	\$189,750.00	-	\$0.00
CYBER ISSUES	600.00	\$759,000.00	141.80	\$225,038.00
EXAMINER PREP	300.00	\$379,500.00	114.60	\$237,363.00
<b>Total</b>	<b>51,805.00</b>	<b>\$65,533,325.00</b>	<b>19,595.20</b>	<b>\$26,877,397.90</b>